

**Objection Deadline: Monday, June 26, 2023, 4:00 PM EDT**  
**Presentment Date: Thursday, June 29, 2023, at 11:00 AM EDT**  
**Hearing Date and Time (Only if Objection Filed): TBD**

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*Attorneys for the Consumer Claims Trustee*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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:  
**In re** : **Chapter 11**  
:  
**DITECH HOLDING CORPORATION, et al.,** : **Case No. 19-10412 (JLG)**  
:  
**Wind Down Estates.<sup>1</sup>** : **(Jointly Administered)**  
: **Related Docket Nos. 3461, 4733**  
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**NOTICE OF PRESENTMENT**  
**OF STIPULATION RESOLVING PROOF OF CLAIM OF**  
**NORMA AND ROBERT DEPRIEST (CLAIM NO. 21473)**

**PLEASE TAKE NOTICE** that the Consumer Claims Trustee,<sup>2</sup> will present the

*Stipulation Resolving Proof of Claim No. 21473* (the “**Stipulation**”) to the Honorable James L. Garrity,

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<sup>1</sup> On September 26, 2019, the Court confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Third Amended Plan**”), which created the Wind Down Estates. On February 22, 2022, the Court entered the Order Granting Entry of Final Decree (I) Closing Subsidiary Cases; and (II) Granting Related Relief (ECF No. 3903) (the “**Closing Order**”). Pursuant to the Closing Order, the chapter 11 cases of the following Wind Down Estates were closed effective as of February 22, 2022: DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). Under the Closing Order, the chapter 11 case of Ditech Holding Corporation (the “**Remaining Wind Down Estate**”) (Case No. 19-10412 (JLG)) remains open and, as of February 22, 2022, all motions, notices and other pleadings relating to any of the Wind Down Estates are to be filed in the case of the Remaining Wind Down Estate. The last four digits of the Remaining Wind Down Estate’s federal tax identification number is (0486). The Remaining Wind Down Estate’s principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 723 (the "**Courtroom**"), One Bowling Green, New York, New York 10004, for signature on Thursday, June 29, 2023 at 11:00 a.m. EDT. A copy of the Stipulation is attached to this Notice as Exhibit A. The Stipulation resolves Proof of Claim No. 21473 by reducing and allowing the claim in the amount of \$8,000.00 as a Class 6 Consumer Creditor Claim and that is not a 363(o) claim as defined by the Third Amended Plan.

**PLEASE TAKE FURTHER NOTICE** that unless a written objection to the Stipulation is served and filed with proof of service with the Clerk of the Court and a courtesy copy is delivered to the undersigned and to the Chambers of Judge Garrity so as to be received by Monday, June 26, 2023 at 4:00 p.m. EDT there will not be a hearing to consider the Stipulation, and the Court may approve the Stipulation.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely filed and served with respect to the Stipulation, a hearing (the "Hearing") will be held to consider the Proposed Stipulation before Judge Garrity in the Courtroom at a date and time to be announced.

**PLEASE TAKE FURTHER NOTICE** that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

Dated: June 12, 2023  
New York, New York

/s/ Richard Levin  
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<sup>2</sup> The Consumer Representative under the Third Amended Plan acts as the Consumer Trustee on behalf of the Ditech Holding Corporation Consumer Creditor Recovery Trust (the "**Consumer Trust**"), established pursuant to the Third Amended Plan.

**EXHIBIT A**

STIPULATION RESOLVING PROOF OF CLAIM NO. 21473

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>DITECH HOLDING CORPORATION, et al.,</b>	:	<b>Case No. 19-10412 (JLG)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	<b>Related Docket Nos. 3461, 4733</b>
-----	<b>X</b>	

**STIPULATION RESOLVING PROOF OF CLAIM NO. 21473**

This stipulation (the “**Stipulation**”) is made and entered into between the Consumer Claims Trustee,<sup>2</sup> and Norma and Robert Depriest (the “**Claimants**” and together with the Consumer Claims Trustee, the “**Parties**”). The Stipulation resolves the objection to Proof of Claim No. 21473 by allowing the claim as indicated below.

1. On February 11, 2019, Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and certain of its affiliates (collectively, the “**Debtor**”) each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code.

<sup>1</sup> On September 26, 2019, the Court confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Third Amended Plan**”), which created the Wind Down Estates. On February 22, 2022, the Court entered the Order Granting Entry of Final Decree (I) Closing Subsidiary Cases; and (II) Granting Related Relief (ECF No. 3903) (the “**Closing Order**”). Pursuant to the Closing Order, the chapter 11 cases of the following Wind Down Estates were closed effective as of February 22, 2022: DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). Under the Closing Order, the chapter 11 case of Ditech Holding Corporation (the “**Remaining Wind Down Estate**”) (Case No. 19-10412 (JLG) remains open and, as of February 22, 2022, all motions, notices and other pleadings relating to any of the Wind Down Estates are to be filed in the case of the Remaining Wind Down Estate. The last four digits of the Remaining Wind Down Estate’s federal tax identification number is (0486). The Remaining Wind Down Estate’s principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

<sup>2</sup> The Consumer Representative under the Third Amended Plan acts as the Consumer Claims Trustee on behalf of the Ditech Holding Corporation Consumer Creditor Recovery Trust (the “**Consumer Trust**”), established pursuant to the Third Amended Plan in the above-captioned bankruptcy cases.

2. On September 26, 2019, the Court confirmed the Debtors' Third Amended Plan. Under the Third Amended Plan, (i) the Plan Administrator, on behalf of each of the Wind Down Estates, has exclusive authority to object to all Administrative Expense Claims, Priority Tax Claims, Priority Non-Tax Claims, and Other Secured Claims; (ii) the GUC Recovery Trustee, on behalf of the GUC Recovery Trust, has the exclusive authority to object to all General Unsecured Claims; and (iii) the Consumer Claims Trustee has the exclusive authority to object to all Consumer Creditor Claims.

3. Claimants filed Proof of Claim No. 21473 asserting an unsecured claim in an unliquidated amount on April 25, 2019.

4. On June 18, 2021, the Consumer Claims Trustee filed the *Forty-Sixth Omnibus Objection to Proofs of Claim (Insufficient Legal Basis Unsecured Consumer Creditor Claims)* (ECF No. 3461) (the "**Objection**"), which included an objection to Proof of Claim No. 21473.

5. On March 23, 2023, the Consumer Claims Trustee filed the *Notice of Hearing on Consumer Claims Trustee's Omnibus Motion to Estimate for Purposes of Distribution Reserves and to Classify Certain Proofs of Claim* (the "**Motion to Estimate**") (ECF No. 4650), which included a request to estimate Proof of Claim No. 21473 at \$75,000.00 for the purpose of setting distribution reserves.

6. On April 27, 2023, the Court granted the relief requested in the Motion to Estimate. The *Order Granting Consumer Claims Trustee's Omnibus Motion to Estimate for Purposes of Distribution Reserves and to Classify Certain Proofs of Claim* (the "**Order to Estimate**"), estimating Claim No. 21473 at \$75,000.00 for the purpose of setting distribution reserves was entered on May 11, 2023. (ECF No. 4733).

7. The Parties have negotiated a settlement with respect to Proof of Claim No. 21473.

8. The Consumer Claims Trustee has determined that entering into this Stipulation is in the best interests of the Wind Down Estates, the Consumer Trust, the Consumer Trust's constituents, the Debtors, and other interested parties.

9. The Parties stipulate and agree that Proof of Claim No. 21473: (a) shall be reduced and allowed in the amount of \$8,000.00 as a Class 6 Consumer Creditor Claim and (b) is a not a 363(o) Claim (as defined in the Third Amended Plan).

10. Claimants understand that claim distributions will be paid in the order specified by the Third Amended Plan and that any actual amount received may be on a pro rata basis.

11. The money damages awarded to Claimants represent the actual amount in dispute and are designated as a legal, compensatory remedy for monetary loss to the Claimants.

12. The terms of this Stipulation shall be deemed to fully resolve any and all claims (as defined in section 101(5) of the Bankruptcy Code) that the Claimants assert or may have against the Debtors, their estates, and the Consumer Trust.

13. The Parties agree to take any and all actions necessary to comply with the terms of this agreement.

14. This Stipulation constitutes the entire agreement between the Parties regarding the matters addressed herein. The Stipulation supersedes all prior and current discussions, negotiations, understandings and agreements, whether oral or written, express or implied, between the Parties.

15. This Stipulation may only be modified by written agreement of all Parties or pursuant to an order of the Bankruptcy Court.

16. The Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Stipulation.

*[Signature page to follow.]*

Dated: June 12, 2023  
New York, New York

**CONSENTING PARTY**

/s/ Richard Levin  
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**CONSENTING PARTIES**

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/s/ Robert Depriest  
Robert Depriest, *pro se*  
2741 S. Pleasant Oak Ct.  
Panama City Beach, FL 32408

SO ORDERED:

Dated: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
**THE HONORABLE JAMES L. GARRITY, JR.**  
**UNITED STATES BANKRUPTCY JUDGE**